IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

The Honorable J. Daniel Breen

This Document Relates To:

Crenshaw Community Hosp., et al. v. General Reinsurance Corp., et al., No. 03-CV-2696 Gateway Regional Health Sys., Inc. v. General Reinsurance Corp., et al., No. 04-CV-2936 Delta Regional Medical Center, et al. v. General Reinsurance Corp., et al., No. 06-CV-2155 Murray Calloway County Hospital v. General Reinsurance Corp., et al., No. 06-CV-2676

UNOPPOSED MOTION OF DEFENDANTS PRICEWATERHOUSECOOPERS LLP AND MILLIMAN INC. FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' SECOND AMENDED, RESTATED & CONSOLIDATED COMPLAINT

Defendants PricewaterhouseCoopers LLP, Gary R. Stephani, Milliman, Inc., and Robert L. Sanders (collectively, "Defendants") respectfully submit this unopposed motion for an extension of time to respond to the Hospital Policyholder Plaintiffs' Second Amended, Restated & Consolidated Complaint ("Complaint"). No party opposes this relief, as set forth in the attached Certificate of Consultation.

The Complaint was filed on July 1, 2011. Defendants intend to move to dismiss all claims asserted against them in the Complaint. The Amended Case Management Order in this action provides that motions brought in lieu of an Answer must be filed within 45 days of the filing of an amended complaint. *See* Doc. No. 274, ¶ 5(b)(iii). Therefore, Defendants' motions to dismiss would ordinarily be due on August 15, 2011.

Hospital Policyholder Plaintiffs and Defendants have agreed to participate in mediation in an effort to resolve the claims asserted in the Complaint. The mediation is scheduled for

September 1, 2011. If the mediation is successful, it will not be necessary to incur the time and expense of briefing and responding to motions to dismiss. In light of this, the parties have agreed to extend the deadline for Defendants to file their respective motions to dismiss to October 28, 2011.

THEREFORE, Defendants respectfully request that the Court extend the time for Defendants PricewaterhouseCoopers LLP, Gary R. Stephani, Milliman, Inc., and Robert L. Sanders to respond to the Complaint to October 28, 2011.

Dated: July 13, 2011

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Respectfully submitted,

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